

# BakerHostetler

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July 8, 2024

Mark DeLaquil

## VIA ECF

Honorable Carol Bagley Amon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Re: Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al., Case No. 1:19-cv-00007 (E.D.N.Y.)*

Dear Judge Amon,

I am counsel for defendant Jamal Trust Bank SAL and intervenor-defendant Dr. Muhammad Baasiri, who intervened in this action in his official capacity as the liquidator of Jamal Trust Bank SAL for the Central Bank of Lebanon. Pursuant to Section 3(A) of Your Honor's Individual Motion Practices and Rules, I respectfully request a pre-motion conference concerning defendants' contemplated motion to substitute parties pursuant to Federal Rule of Civil Procedure 25.

Specifically, defendants anticipate filing a motion under Rule 25 to substitute Dr. Carl Abdo Ayoub, in his official capacity, for Dr. Baasiri. On October 25, 2023, the Central Bank of Lebanon appointed Dr. Ayoub as the liquidator for Jamal Trust Bank following Dr. Baasiri's resignation. Substitution of Dr. Ayoub for Dr. Baasiri is warranted under Rule 25(d) because Dr. Baasiri intervened in this action as a "public officer ... in an official capacity," and Dr. Ayoub is Dr. Baasiri's successor in that public office. Fed. R. Civ. P. 25(d). Alternatively, substitution is warranted under Rule 25(c) because Dr. Baasiri's interest in this matter has been transferred to Dr. Ayoub.

I have conferred with plaintiffs' counsel regarding their position on this motion. Plaintiffs' counsel informed me that: "Plaintiffs do not oppose the substitution inasmuch as Dr. Baasiri is

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retiring, but we reserve the right to make any arguments relating to Dr. Baasiri's American citizenship as it pertains to sovereign immunity."

For the foregoing reasons, defendants respectfully request a pre-motion conference on their contemplated motion to substitute Dr. Ayoub for Dr. Baasiri as an intervenor-defendant under Rule 25.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark DeLaquil", is written over the typed name.

Mark DeLaquil

CC: All counsel of record (via ECF)